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October 7, 2021

**VIA ECF**

Application DENIED because Defendants do not seek to seal Exhibits 1 and 2 to the Hecht Declaration, as stated in their letter at Dkt. No. 150.

Hon. Lorna G. Schofield  
United States District Judge  
United States District Court  
40 Foley Square  
New York, New York 10007

The Clerk of Court is respectfully directed to unseal Dkt. Nos. 141 and 147 and the exhibits attached thereto.

Dated: October 18, 2021  
New York, New York

LORNA G. SCHOFIELD  
UNITED STATES DISTRICT JUDGE

RE: ` *Solid 21, Inc. v. Richemont North America, Inc. et al*, Case No. 1:19-cv-01262-LGS

Dear Judge Schofield,

We represent Plaintiff Solid 21, Inc. ("Solid 21") in the above captioned matter. Solid 21's opposition to Defendant's Motion for Summary Judgment as well as Plaintiff's Cross-Motion for Summary Judgment is due today, October 7, 2021. See ECF No. 134. We respectfully request that permission to file under seal Exhibit 1 and Exhibit 2 to the Hecht Declaration filed in support of Plaintiff's Opposition to Defendant's Motion for Summary Judgment and Cross-Motion for Summary Judgment. Consistent with Section I(D)(iii) of this Court's Individual Rules, these documents will be filed under seal on ECF and electronically related to this letter motion.

Counsel for Plaintiff files these documents fully under seal in an abundance of caution, as Defendant has previously designated these documents as Attorney's Eyes Only, Highly Confidential, or Confidential pursuant to the Protective Order.

Solid 21 thanks the Court for its consideration in this matter.

Respectfully Submitted,

/s/ David L. Hecht  
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*Attorney for Plaintiff Solid 21, Inc.*

cc. Counsel of Record (via ECF)

October 7, 2021

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*Appendix identifying all parties and attorneys of record  
who should have access to the sealed documents*

David L. Hecht, Counsel for Plaintiff

Yi Wen Wu, Counsel for Plaintiff

Andrew J. Lorin, Counsel for Plaintiff

John P. Margiotta, Counsel for Defendant

David Donahue, Counsel for Defendant

Laura E. Popp-Rosenberg, Counsel for Defendant

Daniel M. Nuzzaci, Counsel for Defendant

Emily S. Weiss, Counsel for Defendant

Sydney L. Kipen, Counsel for Defendant